

EXHIBIT A

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1 UNITED STATES DISTRICT COURT

2 DISTRICT OF MINNESOTA

3

4 Brock Fredin,

5 Plaintiff,

6 v.

No. 17-03058 (SRN/HB)

7 Lindsey Middlecamp,

8 Defendant.

9

10 Brock Fredin,

11 Plaintiff,

12 v.

No. 18-cv-00466 (SRN/HB)

13 Grace Elizabeth Miller and

14 Catherine Marie Schaefer,

15 Defendants.

16

17

18 DEPOSITION OF BROCK FREDIN

19 Taken December 5, 2019

20 Scheduled for 9:30 a.m.

21

22

23

24

25 REPORTED BY: JONATHAN WONNELL, RMR

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1 Dave Middlecamp or people re-tweeting the Twitter
2 campaign to her social media, as well as several
3 attorneys -- she's an attorney -- contacted her about
4 that.

5 You're in the same NF court that she runs
6 and managed -- manages based off of Chief Justice
7 Douglas Andahl, and -- so some of the communications
8 related to that. Several attorneys in the NF court
9 came through to ask her about the entire situation.

10 Q And you learned this through e-mails you
11 had with her?

12 A No. This was communication, a family
13 communication.

14 Q Oral communication?

15 A Correct.

16 Q How did you search for documents
17 responsive to our document requests? How did you
18 search your e-mail files, for instance?

19 A I did keyword searches.

20 Q What keywords did you use?

21 A I used keywords related to Lindsey
22 Middlecamp, Grace Miller, Catherine Schaefer-ish case
23 caption: Miller versus Fredin, Schaefer versus
24 Fredin, Middlecamp versus Fredin. I did captions
25 for -- or searches for CardsAgstHrsmt. I did other

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1 searches for David McCabe. I did keyword searches
2 related to my work history.

3 Essentially, every single interrogatory I
4 received I did keyword searches related to those
5 questions.

6 Q Did you produce all the documents that
7 those keyword searches identified?

8 A Absolutely, yes.

9 Q You didn't exclude any of them?

10 A That's true.

11 Q Who's Sarah -- is it Logghe?

12 A Sarah Logghe.

13 Q Who is she?

14 A Sarah Logghe is an ex-girlfriend.

15 Q When did she become an ex-girlfriend?

16 A I'm not sure. I have to check.

17 Q Was it within weeks or months? A year
18 ago?

19 A I would have to check my records. I'm not
20 sure. Ballpark, sure.

21 Q Well, which ballpark?

22 A What you just mentioned.

23 Q Week, months, or a year?

24 A Within the past year.

25 Q Within the past six months?

1 A I'd have to check. I'm not sure.

2 Q And what information does she -- what
3 information do you believe she has with respect to
4 the lawsuit?

5 A Everything. She knows everything.

6 Q Because you spoke to her about it?

7 A Correct.

8 Q E-mailed with her?

9 A No.

10 Q Text messages?

11 A No.

12 Q Social media?

13 A No. We -- at the time we -- I believe
14 that she connected with her family through Facebook,
15 but there was nothing related.

16 Q So you've had no communication with her
17 during the time that the two of you were together
18 about this case either by e-mail, text message or any
19 social media platform. Is that your testimony?

20 A Can you restate the question?

21 Q During the time that you and her were
22 together, you never texted, e-mailed or engaged in
23 social media communications with her regarding the
24 allegations in these two lawsuits?

25 A It was emotional-content based. I believe

1 that perhaps -- I never used Lindsey Middlecamp,
2 Catherine Graver, Grace Miller's name. I never
3 referenced the actual Twitter campaign or the City
4 Pages article or a number of other articles stemming
5 from, like, Reason.com, Eugene Bullock's article or
6 Hacker News. I believe that that was simply
7 in-person communication. If anything, maybe I talked
8 in generalities in text message with her. I did
9 keyword searches, and I did not find specific
10 information I mentioned in the interrogatories or the
11 requests for documents.

12 Q Do you still have these communications
13 with her saved somewhere?

14 A I do. And I looked through them, and I
15 did not find any substantive messages that matched
16 interrogatories or requests for documents.

17 Q You've used the phrase "emotional content"
18 now twice related to documents you've decided not to
19 produce in this case. What do you mean by "emotional
20 content"?

21 A Tortured mental states related to
22 inability to obtain employment in my career field,
23 and, you know, depression surrounding being doxed and
24 ruined, not being able to basically function in the
25 regular world for now three to four years.

1 Q And so the decision not to produce those
2 documents was based on what?

3 A The requests for documents and the
4 interrogatories weren't specific enough to target
5 that information. We're talking about generalities
6 in relationship that simply were not matched with the
7 specific questions.

8 Q Did you keep a log of the e-mails or the
9 documents you decided not to produce?

10 A I did include a deleted log showing
11 potentially deleted files pursuant to your
12 interrogatory requests for documents, the legalese
13 around it. I provided a PDF and a Microsoft Word
14 document at the root of the discovery folders.

15 Q And it's of an in-box?

16 A It's in the Dropbox.

17 Q And you believe it contains what?

18 A A log of deleted files or inaccessible
19 files.

20 Q From your Gmail account?

21 A No. Just files on a computer.

22 Q Why are they inaccessible?

23 A The computers were stolen, based off of
24 Lindsey Middlecamp's violent SWAT raid to serve her
25 restraining order related to her corrupt self-dealing

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1 in the Minneapolis City Attorney's Office where she
2 was acting both as a Minneapolis Assistant City
3 Attorney and using that position to essentially
4 launch this SWAT raid against me to serve her
5 restraining order. All of my computers were taken,
6 stolen, essentially, and when they were returned had
7 significant file changes to them.

8 Q When you say they were stolen, they were
9 taken by the police, correct?

10 A I believe that they were taken to delete
11 information related to Lindsey Middlecamp's leaking
12 of the Miller restraining appellate decision, which
13 she leaked before its official release. Any
14 information related to that was deleted when I
15 reviewed the computers after they were returned.

16 In addition to that, for example, I had
17 screen shots of the Twitter posts before January 23rd
18 or 19th, when that -- whenever the Miller restraining
19 decision was released. I had screen shots of her
20 Twitter post, I believe, in mid-January showing her
21 knowledge that Judge Ross had essentially smeared me
22 in his appellate decision. And then she had posted
23 that on Twitter, and then she later deleted it and
24 then restarted it again.

25 So the gist of this is the fact that those

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1 documents were deleted or made inaccessible by way of
2 Lindsey Middlecamp's extra-judicial actions to launch
3 a SWAT raid against me. Once those items were
4 returned to me, I also declined to review or hook up
5 those machines to my network in fear of the fact that
6 the police could have installed software to monitor
7 my location, to stalk me on behalf of Lindsey
8 Middlecamp.

9 Q So upon return of these devices, you did
10 not plug them in to verify what information was or
11 was not on them?

12 A I did, actually, on one machine, but the
13 other machines I have not.

14 Q And your allegation is the police
15 department specifically deleted files related to
16 Lindsey Middlecamp?

17 A I am not making that allegation. I am
18 simply saying it's my belief that those documents
19 were suddenly not accessible by me after the SWAT
20 raid.

21 Q But you're not blaming Lindsey Middlecamp
22 for that?

23 A I am saying upon information and belief,
24 Lindsey Middlecamp extra-judicial actions led to the
25 fact that she was trying to cover up her leaking of

1 the Miller restraining decision.

2 Q What evidence do you have that the files
3 were, in fact, deleted or rendered inaccessible by
4 the police department?

5 A Because Lindsey Middlecamp has record of
6 the fact that she had posted on Twitter before the
7 official release, and she has record of her
8 conversation on January 24th with a deputy
9 Minneapolis city attorney, Mary Ellen Heng, in which
10 she promoted a prosecution on behalf of her friend,
11 Catherine Schaefer, and those records are directly
12 linked to Tara Patet, who is a St. Paul assistant
13 city attorney, where she then communicated with David
14 McCabe, who is the individual who petitioned for the
15 search warrant in St. Croix, Wisconsin, to raid my
16 house in Hudson, Wisconsin. And --

17 Q Mr. Fredin, the question was: What
18 evidence do you have that the police department
19 either deleted or made inaccessible files of yours on
20 the devices that they took?

21 A Yes. The information I have is related to
22 the search warrants, the pictures from the SWAT raid,
23 the pictures of all my devices, the logs of all my
24 devices that the St. Paul Police took. I also
25 provided pictures of those devices located in the

1 St. Paul property room. And then there were
2 modifications to files on those machines which I
3 reviewed following their return.

4 Q When you say "modifications to files,"
5 what do you mean?

6 A The file logs in UNIX indicated that
7 information was changed related to certain file
8 structures and files therein.

9 Q Do you still have those logs?

10 A Those logs are contained on the machine
11 that was taken.

12 Q So you do not have the logs?

13 A I do have the logs within the machine. I
14 do not have them in a PDF document. It would be way
15 too burdensome for me to go into that machine. I
16 cannot, for security reasons, set up that machine at
17 this point in time.

18 Q Mr. Fredin, you were asked in the
19 interrogatories that were provided to you to identify
20 the various user names and profiles that you use
21 online. I'd like to go through some of those with
22 you now beginning with a user name "youareamazing,"
23 all one word. That was used on Match.com; is that
24 correct?

25 A Yes.

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1 Q Does any of the profile information
2 contained in BlackOutx2 -- is any of that accurate
3 with respect to you?

4 A No.

5 Q The description of dominant couple. That
6 doesn't make any reference to you, does it,
7 Mr. Fredin?

8 A No.

9 Q It's got height and weight of 6-4, 235
10 pounds. There's no reference to you in that profile,
11 correct?

12 A Correct.

13 Q And then it says, "Orientation: Bisexual.
14 Ethnicity, African descent."

15 Neither one of those is accurate with
16 respect to you, is it?

17 A Correct.

18 Q Is there any information at all in this
19 BlackOutx2 profile that would indicate that it's you,
20 Brock Fredin?

21 A It's not me. Your question is indicative
22 of the fact that all of this information is not
23 related to me in any way whatsoever.

24 Q And it doesn't contain any e-mail
25 information, correct?

1 A The BlackOutx2 profile does contain my
2 e-mail address because all these e-mails were
3 forwarded to me. And then I believe that the profile
4 itself actually publicly made my e-mail visible in
5 the profile.

6 Q You say you believe that. Why do you
7 believe that?

8 A I believe that because I received -- not
9 only did I receive these e-mails, but the profile I
10 think had that information and was modified
11 thereafter.

12 Q The profile you provided to us here
13 doesn't contain your e-mail address, does it?

14 A It does.

15 Q Where?

16 A It contains my e-mail address in the
17 profile settings where then all e-mails were
18 forwarded to me.

19 Q But the profile doesn't publicly disclose
20 your e-mail address, correct?

21 A The profile, upon viewing it, included my
22 e-mail address publicly, and then I believe that it
23 was later modified or amended.

24 Q Is this the entirety of the BlackOutx2
25 profile that we see in Exhibit 5?

1 A No.

2 Q What's missing?

3 A The entire visible public profile.

4 Q And where is that?

5 A I produced that in discovery.

6 Q What about the profile for epicviewfu?

7 A What do you mean?

8 Q Where is that profile?

9 A I produced that in discovery.

10 Q Mr. Fredin, you seem awfully confident you
11 produced these things in discovery. Do you have
12 copies of what you produced to us or believe you
13 produced to us?

14 A I do, yes.

15 Q Because from our review, we didn't find
16 any of that documentation.

17 A They're all there. That's just a blatant
18 lie. It's pretty insulting, actually.

19 Q Other than the CollarSpace.com
20 communications, you had mentioned text messages and
21 knocks on the door that you claim constitute
22 nonconsensual sexual activity or sexual solicitation,
23 correct?

24 A Yes.

25 Q How many text messages?

1 A Hundreds, because at the time all of these
2 e-mails were forwarded to my phone, as well as
3 several other messages that I simply ignored.

4 Q Okay. And where are those hundreds of
5 text messages now?

6 A I just ignored them at the time. And I
7 just referenced the e-mails. You know, I thought it
8 would go away within a few months, and so I just
9 ignored that. The text messages are part and parcel
10 to the data provided here.

11 Q All right. But you didn't provide those
12 text messages to us, correct?

13 A I did provide them part and parcel to all
14 this data here.

15 Q When you say "part and parcel," I don't
16 understand what that means. Did you provide the text
17 messages to us, yes or no?

18 A Yes.

19 Q Okay. You say there's hundreds of text
20 messages?

21 A Yes.

22 Q And you're claiming that you produced
23 hundreds of text messages in this lawsuit?

24 A I produced the e-mails, which were
25 forwarded as text messages.

1 Q So you're looking at Exhibit 7 again?

2 A Exhibit 6.

3 Q So when you say --

4 A Exhibit 7.

5 Q So you say "text messages," then, do I
6 infer that to mean that you would get a notification
7 in your in-box but you would also get a text message
8 with the same information?

9 A At that time, that's the way that I had it
10 set up, as well as receiving several other text
11 messages related to this, people contacting me, that
12 I ignored.

13 Q So the text messages, again, are --
14 contain the same messages that we saw in Exhibit 6?

15 A Yes. And the phone that I was using, I
16 never turned on again after the property was
17 returned. So those text messages themselves are
18 simply unavailable.

19 Q Where is that phone now?

20 A That phone was deleted, and I believe that
21 it was sold on the internet.

22 Q When was it deleted?

23 A When I sold the phone on the internet, I
24 deleted the data associated with it.

25 Q You didn't keep any copies?

1 A I didn't turn on the phone after -- well,
2 let me back up. I don't recall if I turned it on. I
3 did not turn on the phone. I sold it on the
4 internet. I don't remember, actually.

5 Q Who did you sell it to?

6 A I don't remember.

7 Q How did you sell it on the internet?

8 A I don't remember.

9 Q When did you sell it on the internet?

10 A For all intents and purposes, when I
11 received the property -- let me back up.

12 When I received the property back, because
13 there were so many items, they took 60 to 70 items,
14 that it was overwhelming. And so the phone that this
15 stuff was on, I had like five or six phones. I
16 couldn't remember exactly which phone I was using at
17 that time.

18 I sold one phone which could have been
19 that phone, and I may have the phone still in
20 property. My life has been sort of in whack. So I
21 don't know exactly where it is. I believe that it's
22 in storage, in a storage unit in St. Louis Park
23 because my mom, before she died, had it, and she put
24 all of my stuff in a storage unit. And I had one or
25 two phones, and I don't recall if that was the exact

1 phone that I had when all of this went down.

2 But I ignored all of these text messages
3 that were forwarded and utilized simply the e-mails
4 themselves.

5 Q Okay. So you ignored them and you did not
6 read them?

7 A I read them.

8 Q Okay. And you read them using the phone?

9 A Correct. They were push notifications on
10 the phone.

11 Q Okay. And the content of the text
12 message, is it the same as what's depicted in
13 Exhibit 6?

14 A Yes. In addition, I had received several
15 other direct text messages from individuals.

16 Q But let's just stick with the
17 CollarSpace.com text messages. You did not open
18 those messages to read the secondary content?

19 A Correct.

20 Q The other text messages that you
21 referenced, where did they come from?

22 A Numbers. Telephone numbers.

23 Q Do you know where those text messages came
24 from or how they obtained your phone number to text
25 you?

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1 from CollarSpace.com -- does that make up the
2 entirety of your nonconsensual sexual solicitation
3 claim?

4 A Generally.

5 Q Well, are there any more incidences, text
6 messages or notifications that we haven't spoken
7 about that you'd like to include?

8 A Just the deleted messages. There were
9 about a hundred, maybe more than that, 120. A couple
10 text messages that were custom text messages in
11 addition to the 120 text messages that were forwarded
12 from these e-mails.

13 Q Those have all been deleted, correct?

14 A I backed up on that because I'm not sure.
15 I did not open that phone after it was returned to
16 me.

17 Q Okay. And when you say the phone and it
18 being returned to you, it's when the police returned
19 your phone and other electronic devices?

20 A That's true.

21 Q And if the phone was sold that contains
22 this information, how close in time was it sold
23 between the time you received it back from the police
24 and the time that you sold it online?

25 A I received five phones back, and I believe

1 that I was using multiple phones at that time, like,
2 one or two phones, and like older models of iPhones
3 when I upgraded. And so I'd use an older model, for
4 example, just for surfing the internet on the couch.

5 And so when I say I sold one of these
6 phones and your question was how soon thereafter the
7 SWAT raid, I believe that it was a year and a half
8 after that I may have sold one of the phones on the
9 internet in order to sustain myself because I was
10 unable to obtain employment during that period of
11 time.

12 Q Okay. You didn't search these phones that
13 you just referenced, these five phones?

14 A That's correct. I did not turn them on.

15 Q So you have not searched those phones for
16 documents responsive to our discovery request?

17 A I am unable to because they were
18 compromised by the St. Paul Police Department and any
19 data that was taken from them would be suspect,
20 because the St. Paul Police Department had modified
21 files anyways. But they're on there. I was unable
22 to do a search.

23 Plus the fact that I did not exactly know
24 where they were, and my living situation and
25 traveling between states is up in the air. So it was

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1 storage unit?

2 A Probably August.

3 Q Other than the five phones you described
4 earlier, what other electronic devices may be in that
5 storage unit?

6 A That's really a -- that's all I know.

7 Q I'm sorry. Did you give me a number?

8 A No. That's about it. That's all I can
9 recall that is associated with documents.

10 Q So there are no computers of any type?

11 A Correct.

12 Q Okay. Did you search any of your
13 computers or did you only use the computer at the law
14 library?

15 A I did search using a phone that I had.
16 And then when I was at the law library forwarded some
17 of the documents to the brockf12 account in order to
18 use their resources, essentially, to produce the
19 PDFs.

20 Q From January of 2016 to present, what
21 computers, if any, have you used to communicate
22 either through Collarspace or these other online
23 profiles or the e-mails addresses that you provided?

24 A The iMac that I had that was seized
25 pursuant to Lindsey Middlecamp's unlawful actions

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1 against me and then -- that's pretty much it.

2 Q Okay. And you haven't searched the iMac;
3 is that correct?

4 A I can't turn it on because the files have
5 been compromised.

6 Q Have you tried to turn it on?

7 A No.

8 Q When you refer to compromised files, again
9 we're talking about the police seizure of that device
10 as well with others?

11 A I can't trust any devices that have been
12 seized by law enforcement.

13 Q And where is that iMac today?

14 A I believe that it's in the storage unit.
15 I'm sorry. I'm contradicting myself. It is in the
16 storage unit. It's in storage. I'm not trying to
17 intentionally mislead. There's so many devices, I'm
18 just trying to associate specific devices to where
19 they're at.

20 Q Yeah. And if you want to correct the
21 testimony, I'm perfectly fine doing that. I'd rather
22 get your best recollection rather than your guess.

23 A My best recollection is that it's in the
24 storage unit.

25 Q We talked about two Collarspace accounts

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1 the revenge porn campaign that Lindsey Middlecamp
2 produces on CardsAgstHrsmt is eerily almost if not
3 identical to this sort of conduct.

4 For example, this is a shirtless black
5 man.

6 Q All right. So let's back up and try this
7 again. How did you capture Ms. Schaefer's IP
8 address?

9 A I received data from an analytics service.

10 Q Which service?

11 A Google Analytics. Showing that HTTP
12 requests made to retrieve data were made, in
13 reference to this whole smear campaign, were made
14 from State College, Pennsylvania, and it indicated
15 her IP address at the same time that all of this was
16 going down.

17 Q Well, you made the -- so Google Analytics
18 ran or captured the IP address related to what
19 communication or website?

20 A I believe that it was a website dorseyhq
21 or lindseymiddlecamp.com.

22 Q And those are websites that you created,
23 correct?

24 A That's false.

25 Q Well, how did you get the Google Analytics

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1 if they weren't websites that you had control over?

2 A I received the information by way of a
3 friend, but I did not have direct knowledge of any
4 intentions or actions related to any websites going
5 up.

6 Q Who's the friend?

7 A I'm not going to answer that question.

8 Q Why not?

9 A Because it's not relevant.

10 Q Well, you just described for me how you
11 obtained the IP address of my client through a
12 friend. I'd like to know the friend's name.

13 A Right. And I'm not going to answer that
14 question.

15 Q Well, Mr. Fredin, you're making a claim
16 that Ms. Schaefer created these false profiles
17 because you believe that her IP address is associated
18 with them. You then tell me that the IP address was
19 obtained through two websites, lindseymiddlecamp.com
20 and dorseyhq, for which you say you don't control but
21 that are controlled by a, quote, unquote, friend.

22 So I'll ask you again, who's the friend?

23 A I did a search of these websites. They
24 don't exist. Dorseyhq doesn't exist.

25 Lindseymiddlecamp doesn't exist.

1 Q It did, because you just told me it did.

2 A But it doesn't exist. And the information
3 I received was simply for legal purposes to track
4 down through private investigators Catherine
5 Schaefer's involvement.

6 Q Who developed the site dorseyhq and
7 lindseymiddlecamp.com?

8 A I will object on relevance.

9 Q They were created by Anthony Zappin,
10 correct?

11 A Again, I'm objecting on relevance.

12 Q You and Mr. Zappin collaborated on the
13 creation of those websites and other websites, true?

14 A I'm objecting on relevance.

15 Q You're refusing to answer the question as
16 to who created the website dorseyhq and
17 lindseymiddlecamp.com; is that correct?

18 A I'm objecting on relevance. I'm not
19 refusing to answer.

20 Q Well, Mr. Fredin, there's a website with
21 my client's name attached to it along with some
22 harmful information contained within it. How it's
23 not relevant, I don't understand. But if you're
24 going to maintain the objection and not answer we can
25 certainly certify that question to the Court. So I'm

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1 But you're refusing to answer any questions relating
2 to Mr. Zappin, is that my understanding?

3 A Objection, asked and answered.

4 (Fredin Exhibit 22 was marked for
5 identification.)

6 | BY MR. BREYER:

7 Q Mr. Fredin, Exhibit 22 is the Twitter
8 account with the handle @mncourtshq. Do you see
9 that?

10 A Yes.

11 | O This is an account that you created?

12 A Objection, relevance.

13 Q Are you going to answer the question?

14 A NO.

15 Q You don't deny, then, that you did create
16 this document -- this Twitter handle?

17 A I'm objecting on relevance.

18 Q Much of the content in this Twitter handle
19 is in fact your post, correct?

20 A I'm objecting on relevance.

21 O Do you still maintain this account?

22 A I'm objecting on relevance.

Q You're not answering the question?

24 A I'm objecting on relevancy.

25 O And, again, you're refusing to answer?

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1 A I'm not refusing to answer. I'm just
2 objecting on relevance.

3 Q Sure. And now I want your answer now that
4 you've given your objection. Are you going to give
5 me an answer?

6 A No.

7 (Fredin Exhibit 23 was marked for
8 identification.)

9 BY MR. BREYER:

10 Q So Exhibit 23 is a copy of a website that
11 was made for Catherine Schaefer and I should have
12 included it when we talked about the last two
13 websites, including the one with Grace Miller and
14 Ms. McQuitty. You created this website as well; is
15 that correct?

16 A Objection, relevance.

17 Q You're not going to answer the question?

18 A No.

19 Q If you would turn to page 3 of this
20 document you can see some of the exhibits we looked
21 at today including those referencing BlackOutx2,
22 correct?

23 A Yes

24 Q And that content you posted to this
25 website?

1 A This content appears to show Catherine
2 Schaefer's revenge pornography targeting me. It
3 appears to show a website promoting the fact that it
4 is Catherine Schaefer indeed targeting me, violating
5 the law. That's what I see from this document.

6 Q That's not my question. My question is
7 you provided this content, correct?

8 A Objection, relevance.

9 Q You're not going to answer the question?

10 A NO.

11 Q Is that a no?

12 A NO.

13 Q If you look at the remaining pages of
14 Exhibit 23, it contains additional information,
15 Facebook posts and photos, all of which were sourced
16 from you, correct?

17 A Objection, relevance.

18 Q Are you going to answer?

19 A No.

20 (Fredin Exhibit 24 was marked for
21 identification.)

22 BY MR. BREYER:

23 Q You have before you Exhibit 24, which is
24 your complaint filed in Federal District Court of
25 Minnesota against Referee Clysdale amongst others,